

Vanessa R. Waldref  
United States Attorney  
Eastern District of Washington  
Frieda K. Zimmerman  
Assistant United States Attorney  
Post Office Box 1494  
Spokane, WA 99210-1494  
Telephone: (509) 353-2767

FILED IN THE U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JAN 17 2024

SEAN F. McAVOY, CLERK  
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

KAYDEE JEAN BAKER and BETH  
ANN HAYES,

Defendants.

2:24-CR-8-TOR

INDICTMENT

Vio: 18 U.S.C. § 1344(1) and (2)  
Bank Fraud  
(Counts 1-10)

18 U.S.C. § 982(a)(2)(A)  
28 U.S.C. § 2461(c)  
Forfeiture Allegations

The Grand Jury charges:

GENERAL ALLEGATIONS

1. At all times relevant to this Indictment, Defendant KAYDEE JEAN BAKER was a resident of Thurston County, Washington.

2. At all times relevant to this Indictment, Defendant BETH ANN HAYES was a resident of Thurston County, Washington.

3. At all times relevant to this Indictment, Key Bank was a financial institution with accounts insured by the Federal Deposit Insurance Commission. At all times relevant to this Indictment Key Bank was headquartered in the Northern

1 District of Ohio, and transacted business at bank branches that it maintained in the  
2 Eastern District of Washington.

3 4. At all times relevant to this Indictment, Key Bank Account ending in  
4 6599 was located in Airway Heights, in the Eastern District of Washington.

5 The Scheme to Defraud

6 5. Beginning on a date unknown but no later than May 20, 2023, and  
7 continuing to a date unknown but at least August 2, 2023, Defendants KAYDEE  
8 JEAN BAKER and BETH ANN HAYES knowingly devised and intended to devise  
9 a scheme to defraud Key Bank, a financial institution, and in order to obtain money  
10 under the custody and control of Key Bank, by means of materially false and  
11 fraudulent pretenses, representations, and promises.  
12

13 Manner and Means

14 6. As part of this scheme, Defendants KAYDEE JEAN BAKER and  
15 BETH ANN HAYES ordered checks displaying a routing number and bank account  
16 number for a bank account that did not belong to them, but instead belonged to the  
17 Kalispel Tribe's Northern Quest Resort & Casino, Key Bank Account ending in  
18 6599, causing the checks to be mailed to Defendants for the purpose of carrying out  
19 the scheme.

20 7. During and as part of the execution of the fraudulent scheme,  
21 Defendants KAYDEE JEAN BAKER and BETH ANN HAYES then used the  
22 checks drawing from Key Bank Account ending in 6599, attempting to use the funds  
23 in that account for their own financial gain.  
24

25 8. On or about May 20, 2023, Defendant KAYDEE JEAN BAKER placed  
26 an order online with CarouselChecks.com. That order included personal checks in  
27 the name of Defendant BETH ANN HAYES and custom photo checks in the name  
28

1 of Defendant KAYDEE JEAN BAKER. The routing number and bank account  
2 number on both sets of checks ordered was for Key Bank account ending in 6599.

3 9. On or about May 23, 2023, the order was shipped to Defendant  
4 KAYDEE JEAN BAKER at a P.O. Box in Lacey, Washington. The P.O. Box on the  
5 order as the shipping address was also the address printed on both sets of checks.

6 10. On or about May 31, 2023, Defendant BETH ANN HAYES knowingly  
7 and without lawful authority wrote Check Number 900054, purporting to issue from  
8 Key Bank Account ending in 6599, to J.T. in the amount of \$4,000.00. This check  
9 was presented to a financial institution for fulfillment on or about May 31, 2023.  
10

11 11. On or about May 31, 2023, Defendant BETH ANN HAYES knowingly  
12 and without lawful authority wrote Check No. 900058, purporting to issue from Key  
13 Bank Account ending in 6599, to Les Schwab Tires in the amount \$1,329.75. This  
14 check was presented to a financial institution for fulfillment on or about June 1,  
15 2023.

16 12. On or about May 31, 2023, Defendant KAYDEE JEAN BAKER  
17 knowingly and without lawful authority wrote Check No. 660001, purporting to  
18 issue from Key Bank Account ending in 6599, to B.S. in the amount of \$3,000.00.  
19 This check was presented to a financial institution for fulfillment on or about June  
20 2, 2023.

21 13. On or about May 31, 2023, Defendant BETH ANN HAYES knowingly  
22 and without lawful authority wrote Check No. 900060, purporting to issue from Key  
23 Bank Account ending in 6599, to Harley Davidson in the amount of \$1,043.25. This  
24 check was presented to a financial institution for fulfillment on or about June 5,  
25 2023.  
26

27 14. On or about May 31, 2023, Defendant BETH ANN HAYES knowingly  
28 and without lawful authority wrote Check No. 900061, purporting to issue from Key

1 Bank Account ending in 6599, to Harley Davidson in the amount of \$247.46. This  
2 check was presented to a financial institution for fulfillment on or about June 5,  
3 2023.

4 15. On or about June 2, 2023, Defendant BETH ANN HAYES knowingly  
5 and without lawful authority wrote Check No. 900009, purporting to issue from Key  
6 Bank Account ending in 6599, to G.K. in the amount of \$1,500.00. This check was  
7 presented to a financial institution for fulfillment on or about June 14, 2023.

8 16. On or about June 12, 2023, Defendant BETH ANN HAYES knowingly  
9 and without lawful authority wrote Check No. 900007, purporting to issue from Key  
10 Bank Account ending in 6599, to T.Z., in the amount of \$200.00. This check was  
11 presented to a financial institution for fulfillment on or about June 22, 2023.

12 17. On or about July 9, 2023, Defendant KAYDEE JEAN BAKER  
13 knowingly and without lawful authority wrote Check No. 660012, purporting to  
14 issue from Key Bank Account ending in 6599, to Y.A., in the amount of \$7,500.00.  
15 This check was presented to a financial institution for fulfillment on or about July  
16 11, 2023.

17 18. On or about July 27, 2023, Defendant KAYDEE JEAN BAKER  
18 knowingly and without lawful authority wrote Check No. 660164, purporting to  
19 issue from Key Bank Account ending in 6599, to S.G., in the amount of \$7,500.00.  
20 This check was presented to a financial institution for fulfillment on or about July  
21 28, 2023.

22 19. On or about August 2, 2023, Defendant KAYDEE JEAN BAKER  
23 knowingly and without lawful authority wrote Check No. 660174, purporting to  
24 issue from Key Bank Account ending in 6599, to A.V., in the amount of \$4,800.00.  
25 This check was presented to a financial institution for fulfillment on or about August  
26 3, 2023.

## COUNTS 1 – 10

20. The allegations in paragraphs 1 through 19 of this Indictment are incorporated as through realleged herein.

21. Beginning on a date unknown but no later than May 20, 2023, and continuing to a date unknown but at least August 2, 2023, in the Eastern District of Washington and elsewhere, Defendants KAYDEE JEAN BAKER and BETH ANN HAYES, for the purpose of executing the scheme described above, knowingly executed and attempted to execute a scheme and artifice to defraud Key Bank, a financial institution, and Key Bank Account ending in 6599, an account located in the Eastern District of Washington, which scheme and artifice employed material falsehoods, and did knowingly, and with intent to defraud, and to obtain the money, assets, and property under the custody or control of the financial institution by means of materially false or fraudulent pretenses, representations, or promises, by fraudulently writing checks for an account to which they had no lawful authority, described below for each count, each execution of the scheme and artifice constituting a separate count:

Count	Date	Check No.	Payee	Amount
1	May 31, 2022	900054	J.T.	\$4,000.00
2	May 31, 2022	900058	Les Schwab Tires	\$1,329.75
3	May 31, 2022	660001	B.S.	\$3,000.00
4	May 31, 2022	900060	Harley Davidson	\$1,043.25
5	May 31, 2022	900061	Harley Davidson	\$247.46
6	June 2, 2023	900009	G.K.	\$1,500.00
7	June 12, 2023	900007	T.Z.	\$200.00
8	July 9, 2023	660012	Y.A.	\$7,500.00
9	July 27, 2023	660164	S.G.	\$7,500.00
10	August 2, 2023	660174	A.V.	\$4,800.00

1 all in violation of 18 U.S.C. § 1344(1) and (2).

2 NOTICE OF FORFEITURE ALLEGATIONS

3 The allegations set forth in this Indictment are hereby realleged and  
4 incorporated herein by this reference for the purpose of alleging forfeitures.

5 Bank Fraud

6 Pursuant to 18 U.S.C. § 982(a)(2)(A), upon conviction of an offense(s) in  
7 violation of 18 U.S.C. § 1344, Bank Fraud, as set forth in Counts 1 - 10 of this  
8 Indictment, the Defendants KAYDEE JEAN BAKER and BETH ANN HAYES,  
9 shall forfeit to the United States of America, any property constituting, or derived  
10 from, proceeds obtained, directly or indirectly, as a result of such violation(s). The  
11 property to be forfeited includes, but is not limited to:

12 MONEY JUDGMENT

13 A sum of money in United States currency representing the amount  
14 of proceeds obtained by the Defendants as a result of the bank fraud  
15 violations.

16 If any of the property described above, as a result of any act or omission of  
17 the Defendants:  
18

- 19 a. cannot be located upon the exercise of due diligence;  
20 b. has been transferred or sold to, or deposited with, a third party;  
21 c. has been placed beyond the jurisdiction of the court;  
22 d. has been substantially diminished in value; or  
23 e. has been commingled with other property which cannot be divided  
without difficulty,

24 the United States of America shall be entitled to forfeiture of substitute property  
25 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28  
26 U.S.C. § 2461(c). All pursuant to 18 U.S.C. § 982(a)(2)(A) and 28 U.S.C. §  
27 2461(c).  
28



1 DATED this 17th day of January 2024.

2 A TRUE BILL



6 Vanessa R. Waldref  
7 Vanessa R. Waldref  
8 United States Attorney

9  
10 Frieda K. Zimmerman  
11 Frieda K. Zimmerman  
12 Assistant United States Attorney